

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

FRANCISCO ZAYAS SEIJO

DEBTOR

**CASE NO. 21-03259
EAG**

CHAPTER 13

**OPPOSITION TO ANTONIO CABRERO MUNIZ OBJECTION TO
CONFIRMATION**

TO THE HONORABLE COURT:

COMES NOW debtor, represented by the undersigned attorney and respectfully represents and prays as follows:

1. On or about December 22, 2021, debtor through the undersigned attorney received copy of a motion titled “ **OBJECTION TO CONFIRMATION**”, hereinafter the motion.

We oppose to **ANTONIO CABRERO** request on the following grounds:

2. The value of the real estate properties are an estimated one; appraisals will be submitted in the next 15 days.

3. The lump sum payment will come from the sale of either Jayuya property or Jardines Fagot property.

4. The debtor will start to received income from rent in January 2022 and that income will be devoted to fund the plan; due to the Covid 19 situation rent was not received in a regular basis and the debtor could not devote an irregular income that 6 months prior to the Voluntary petition he did not received.

5. The plan is file in good faith, the debtor is trying to reorganize his debts and protect the real estate properties that belongs to him and his wife; the total amount owed to Mr. Cabrero was included.
6. As of today Mr Cabrero had not filed any Proof of claim to contradict the amount listed in the schedules; Jardines Fagot lien with Mr Cabrero was listed; once we have the appraisals an amended plan and schedules will be filed.
7. The 2300.00 rent income was not included because 6 months prior to the filing of this case the debtor was not receiving this income.
8. All assets of the debtors were included.
9. The creditor is trying to litigate and or bring issues to this case that were already solved; he obtained a judgment and the debtor is trying to paid with out losing any of his properties.
10. The debtor complied in whole and or in part with **MR CABRERO** request on 12-23-2021.

WHEREFORE applicant prays from this Honorable Court to deny the **OBJECTION TO CONFIRMATION** .

I HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification, upon information and belief, of such filing to all parties in interest, including but not limited to: Monsita Lecaroz Arribas, Esq., U.S. Trustee's Office, Ochoa Building, Suite 301, 500 Tanca Street, Old San Juan, P.R. 00906 and Chapter 13 Trustee Alejandro Oliveras, Esq. We will serve by regular mail this document to any the above-named persons, upon knowing that they are non CM/ECF participants.

RESPECTFULLY SUBMITTED.

In Ponce, Puerto Rico, December 23, 2021

/s/CARLOS TEISSONNIERE RODRIGUEZ
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